

MEMONEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTIONTO Mr. Robert ReedFROM Mr. Robert PlumbDATE March 6, 1979SUBJECT L.E. Carpenter & Co., 170 North Main Street, Wharton, NJ
The Abandoned Waste Disposal Area

On January 18, 1979, an industrial on-site inspection was conducted at the above referenced company. Present for the inspection were:

Mr. Robert Plumb, NJDEP
Mr. Steven Swyhart, NJDEP
Mr. Henry Jarrett, Plant Engineer

During the inspection it became apparent that appropriate corrective measures have never been initiated to eliminate groundwater contamination at the abandoned waste disposal site. This area was first brought to the Department's attention on February 1, 1975 (enclosure "D"). Plans were subsequently submitted to the DEP (enclosure "N") which included the removal of waste material from the disposal area but the actual clean up was never conducted.

Background Information

On January 29, 1975, L.E. Carpenter & Co. had a spill of chemicals (polyvinyl chloride and solvents) which entered the Rockaway River resulting in a fish kill (enclosure "G"). A subsequent site inspection by Edward J. Faille, DEP Special Services, revealed two discharges plus the abandoned disposal site. One discharge consisted of process wastewater from a septic system while the other contained contaminated leachate which was being pumped from a pit to the Rockaway River (enclosure "D"). A protracted cleanup period resulted in the elimination of surface discharges to the Rockaway River but corrective measures for the on-site disposal area were never undertaken. After receipt of an \$800 check from L.E. Carpenter both the Attorney General's Office and Special Services considered there areas of responsibility in the case resolved. It was the understanding of Mr. Henry Jarrett, Plant Engineer, L.E. Carpenter, and Mr. John Vernam, Hazardous Substance Control, that the Solid Waste Administration (SWA) was to provide guidance to L.E. Carpenter in locating a satisfactory disposal site for the sludge. Upon checking with the Solid Waste Administration, Bureau of Hazardous and Chemical Wastes, the writer was told that there was no record of this case. Attached are copies of pertinent correspondence and memos from the Office of Hazardous Substance Control.

Current Situation

On February 5, 1979, the writer was contacted by Ronald Corcorry, Bureau of Hazardous and Chemical Wastes, SWA, concerning the Rockaway Valley Regional Sewerage Authority and its projected sewer construction through the property of L.E. Carpenter. A preliminary study by Elson T. Killam Associates, Inc. has revealed groundwater contamination from test pits along the project line (519 RVRSA Contract V - Wharton Section) inside the L.E. Carpenter property. Attached

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is a copy of a letter dated February 2, 1979 from James R. Kane of Elson T. Killam Associates, Inc. to the Rockaway Valley Regional Sewerage Authority which includes a discussion of the dewatering problem, proposed corrective measure, estimated costs, test pit sampling procedure, analysis and site diagram (enclosure "V"). Mr. Kane is currently making arrangements to have three additional test holes dug to better define the area presently influenced by the disposal site.

The following schedule was given by Mr. Kane concerning construction activities. "Although no firm schedule for construction activities has yet been established, we believe the necessary arrangements for disposal of this material should be made as much in advance as possible. It is conceivable that since a "Notice to Proceed" has been issued to the Contractor, construction activities could commence within the area, with only one to two weeks notice and the necessary authorization should be made within this time frame, if the possibility of a work suspension is to be avoided" (enclosure "V"). In my conversation with Mr. Kane he indicated that actual construction work on Contract V - Wharton Section would begin southeast of L.E. Carpenter with the section traversing the L.E. Carpenter property held till last.

Conclusion

Due to the sewer line construction by RVRSA enforcement measures should be immediately initiated to resolve the present ground water contamination originating from the abandoned disposal area at L.E. Carpenter & Co.

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INDEX OF ENCLOSURES

<u>Date</u>	<u>Subject</u>
A. February 3, 1975	Letter to Mr. John Vernam, NJDEP, from Mr. Michael V. Polito, USEPA containing analysis of sample from L.E. Carpenter & Company.
B. February 27, 1975	Letter to Mr. John Vernam from Mr. Henry Jarrett, L.E. Carpenter, containing update of corrective measures and a listing of chemicals used at the company.
C. April 22, 1975	Letter to Mr. John Vernam from Mr. Henry Jarrett which includes analysis of soil samples from the company.
D. June 10, 1975	Memo to spills file from Edward J. Faille, NJDEP describing spill and corrective measures from February 1, 1975 to May 12, 1975.
E. June 25, 1975	Memo to spills file from John Vernam concerning a meeting of June 3, 1975 at L.E. Carpenter to determine compliance of verbal abatement schedule.
F. August 7, 1975	Letter to Mr. Vernam and Mr. Faille from Mr. Theodore A. Schwartz, Counsellor at Law for L.E. Carpenter, indicating that the company is to hire a consulting engineer for the waste disposal and clean up problem.
G. August 19, 1975	Memo to spill file from Edward J. Faille indicating violations pertinent to January 29, 1975 and a penalty schedule.
H. September 24, 1975	Letter to Mr. Edward J. Faille from Theodore A. Schwartz confirming the fact that L.E. Carpenter engaged Mr. Wehran to prepare an engineering report on the existing lagoon and future disposal practices.
I. October 10, 1975	Letter to Mr. Edward J. Faille from Mr. Theodore A. Schwartz containing a listing of temporary measure to be effectuated by L.E. Carpenter.
J. October 27, 1975	Memo to the spill file from John Vernam listing conditions at L.E. Carpenter per his inspection of October 23, 1975.

<u>Date</u>	<u>Subject</u>
K. November 10, 1975	Letter to Mr. Edward J. Faille from Mr. Theodore A. Schwartz indicating that there was a delay in the submittal of the company's engineering report.
L. February 19, 1976	Letter to Mr. Walter Robinson, NJDEP from Mr. Theodore A. Schwartz concerning the Notice of Prosecution dated February 2, 1976 and a request to hold the penalty in obedience until arrangements could be made to discuss this situation with all concerned.
M. February 27, 1976	Memo to Mr. Neil Magnus, Deputy Attorney General from Mr. Bruce Pyle, NJDEP in support of a fine schedule for \$1550.
N. March 5, 1976	Letter to Mr. John W. Vernam from Mr. Theodore A. Schwartz listing corrective recommendations from the consulting engineer. A copy of the site plan is attached to the letter.
O. March 9, 1976	Memo from L.E. Carpenter listing ingredients present in P.V.C. waste sludge.
P. March 24, 1976	Letter to Mr. Theodore A. Schwartz from Mr. John Vernam commenting on the engineering report from Wehran Engineering Corporation.
Q. August 27, 1976	Letter to Mr. Edward J. Faille from Wehran Engineering Corporation, Engineering Consultant for L.E. Carpenter, concurring that Mr. Singleton would have the sludge analyzed from the disposal site.
R. November 12, 1976	Letter to Mr. Keith Onsdorff, Deputy Attorney General, from Mr. Theodore A. Schwartz which contained a check payable to the State of New Jersey for \$800 from L.E. Carpenter.
S. October 24, 1977	Report to L.E. Carpenter from William S. Gilman, United States Testing Company, Inc. containing analysis of P.V.C. sludge at company's disposal site.
T. January 18, 1979	Photo survey by Robert Plumb, NJDEP of disposal area at L.E. Carpenter.

Date

Subject

U. January 29, 1979

Memo to Robert Plumb from Doris Cone, NJDEP concerning L.E. Carpenter's NPDES discharges from June, 1977 through April, 1978.

V. February 2, 1979

Letter to the Rockaway Valley Regional Sewerage Authority (RVRSA) from James R. Kane, Elson T. Killam Associates, Inc. consultant for the RVRSA, which includes a discussion of the dewatering problem on the sewer project line at L.E. Carpenter.

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RECEIVED

FEB 08 1979

DEPT. ENVIRONMENTAL PROTECTION
NEWARK OFFICE

February 2, 1979

Rockaway Valley Regional Sewerage Authority
RD 1, 99 Green Bank Road
Boonton, New Jersey 07005

Attention: Mr. John P. Whalen,
Chairman

Re: 519 RVRSA
Contract V - Wharton Section
L. E. Carpenter & Company

Gentlemen:

As discussed briefly at our meeting on January 25, 1979, we have obtained the results of the laboratory tests performed on samples of groundwater taken from test pits excavated on the L. E. Carpenter and Company property in the Borough of Wharton. A copy of the tabulation of test results is attached hereto for your review and information. As indicated in the tabulation, Sample 1 and Sample 2 were tested in two phases, since the fluid readily separated due to the high oil and grease content. The tests were run in this manner in order to evaluate the acceptability of skimming the floating material for disposal and permitting discharge of the remaining solution to the River or the sewer system.

In reviewing these test results, it is our opinion that Samples 1 and 2, taken from test pit locations as indicated on the attached plan, show levels of oil and grease, phthalate and Xylene in both phases, which are high enough to preclude disposal of dewatering discharges either directly to the Rockaway River or to the existing sanitary sewer system. As alternatives, the discharge can either be treated on site, utilizing portable treatment units, followed by discharge to the sewer system or removed from the site, treated and disposed of by an outside service company specializing in chemical waste disposal. In our opinion, the second of these alternatives represents the most desirable solution to the disposal problem, since it is conceivable that reliability and control of an on-site treatment unit may result in questionable efficiencies and effectiveness.

We are currently in contact with SCA Chemical Services Company, Earthline Division, of Newark, New Jersey, in order to establish estimated costs for transportation and disposal of the dewatering discharge. On a preliminary basis, Earthline has indicated that depending upon composition, these costs could range from \$0.15 per gallon to \$2.00 per gallon. On this basis, assuming an overall quantity of 20,000 gallons of discharge, the total costs could range from \$3,000 to \$40,000, plus transportation costs. A sample of the material has been delivered to Earthline for their analysis and we anticipate receiving a firm quotation on the related costs within the coming week. The overall quantity of 20,000 gallons has been estimated based upon observations made during the test pit excavations. We are currently making arrangements to have three additional test holes dug and tested, downstream of the Carpenter property to better define the area presently influenced by the landfill and to determine the length of trench from which disposal of dewatering discharges would be necessary.

In addition, because of the unusual nature of the dewatering requirements, we believe it likely that some additional costs may be incurred by the contractor during construction operations within the area influenced by the Carpenter waste landfill. This issue has not been evaluated or discussed with the contractor at this time but we believe the effects of the disposal operation on construction activities can be minimized through the cooperative efforts of all parties.

Although no firm schedule for construction activities at this location has yet been established, we believe the necessary arrangements for disposal of this material should be made as much in advance as possible. It is conceivable that since a "Notice to Proceed" has been issued to the Contractor, construction activities could commence within the area, with only one to two weeks notice and the necessary authorization should be made within this time frame, if the possibility of a work suspension is to be avoided.

We have contacted the New Jersey Department of Environmental Protection Bureau of Hazardous and Chemical Wastes, in order to advise them of the conditions encountered. We are awaiting response from the Bureau concerning their possible involvement either prior to or during construction within the effected area.

Should the Authority have any questions concerning this matter, we will be available to discuss them at your earliest convenience.

Very truly yours,

ELSON T. KILLAM ASSOCIATES, INC.

JRK/acl

cc: Mr. William H. Francisco, Jr.
Joseph J. Maraziti, Jr., Esq.
Mr. Chester F. Ritzer

All RVRSA Member Municipalities Representatives
Bureau of Hazardous & Chemical Wastes (DEP) (Attn: Ronald Korcory)

James R. Kane

SAMPLES
1/24/79

SAMPLES COLLECTED: 1/4/79 at L.E. Carpenter Site

ANALYSIS	SAMPLE #1		SAMPLE #2		SAMPLE #3	SAMPLE #4
	WATER PHASE	MIXED PHASE	WATER PHASE	MIXED PHASE	MIXED PHASE	MIXED PHASE
<u>GENERAL</u>						
pH	7.5	-	7.1	-	7.2	7.1
COD	700.	24,000	170	17,500	290	80.
BOD	-	5,600	-	9,000	90	7.
Oil & Grease	3,100	>20,000*	6,300	>20,000*	80	20.
TDS	250.	-	110	-	240.	692.
TVDS	80.	-	110	-	184.	294.
<u>ORGANICS</u>						
Total Phthalate Esters (P.E.)	30.	14,300	N	5,300	11.	1.2
Diethyl P.E.	-	-	0	-	-	-
Dimethyl P.E.	25.	9,000	T	3,300	7.	0.8
Xylene	10.	3,600	AVAILABLE	1,300	3.	0.3
Polyalkylene-Glycol	200.	6,200.	200.	1,900.	-	-
Phenols	0.0	0.0	0.0	0.0	0.0	0.0
	0.65	-	-	0.39	< 0.10	< 0.10
<u>HEAVY METALS</u>						
Antimony	< 0.10	NOT	< 0.10	NOT	< 0.10	< 0.10
Titanium	0.12	AVAILABLE	0.08	AVAILABLE	< 0.05	< 0.05
Tin	< 0.20		< 0.20		< 0.20	< 0.20
Cadmium	< 0.005	0.006	< 0.005	0.007	< 0.005	< 0.005
Lead	< 0.02	0.04	< 0.02	< 0.020	0.155	< 0.020
Nickel	< 0.005	0.065	< 0.005	0.045	< 0.005	< 0.005
Zinc	0.020	0.166	0.019	0.125	0.037	< 0.005
Mercury	< 0.0001	0.0008	< 0.0001	< 0.0001	0.0004	< 0.0001
Arsenic	< 0.001	0.011	0.004	0.013	0.009	< 0.001

RESULTS IN MG/L

*APPROXIMATE OIL & GREASE VALUES

DEPARTMENT OF ENVIRONMENTAL PROTECTION
POLLUTION CONTROL MONITORING, SURVEILLANCE & ENFORCEMENT

REPORT OF PHONE CALL
VISIT

In _____ Out _____
Date 3/27/79 Time _____

File _____
Routing R. J. [Signature]

Person Contacted GORDON TASKER Phone No. _____
Affiliation BUCKHAWK VALLEY REGIONAL SEWERAGE AUTHORITY
Subject of Call SEWER CONSTRUCTION - WHARTON SECTION CONTRACT V
Visit _____

Summary of Call Mr. Tasker stated that Modern
Visit Transportation was given the contract
for transportation and disposal of the
dewatering discharge in area of L.F.
Carpenter Co.

No estimate could be given on construction
time.

Action Recommended _____

Bob Plumb
Signature